COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE TARIFF FILING OF SOUTH CENTRAL

BELL TELEPHONE COMPANY'S PROPOSED

REVISIONS TO ITS KENTUCKY INTRASTATE

ACCESS TARIFF, P.S.C. KENTUCKY TARIFF

2E

CASE NO. 92-315

ORDER

On July 2, 1992, South Central Bell Telephone Company ("South Central Bell") filed revisions to its Kentucky Intrastate Access Tariff, 2E, which introduces Open Network Architecture Intrastate Access Service and associated charges. South Central Bell proposed that the filing become effective on and after July 31, 1992.

On July 28, 1992, SCB was sent a letter accepting the above-referenced tariff revision. The Commission, however, received a motion to intervene on July 29, 1992, from MCI Telecommunications Corporation ("MCI") requesting full intervention and requesting that the tariff filing be suspended. (The motion is attached hereto and incorporated herein and marked Exhibit A.)

The Commission finds that pursuant to KRS 278.190, further proceedings are necessary in order to determine the reasonableness of the above-mentioned proposed tariff filing. MCI should be granted full intervention in this proceeding.

IT IS THEREFORE ORDERED that:

- 1. The proposed tariff be and it hereby is suspended for five months from July 31, 1992 up to and including December 30, 1992.
- 2. Nothing contained herein shall prevent the Commission from entering a final decision in this matter prior to the termination of the suspension period.
 - The motion of MCI to intervene is granted.
- 4. MCI shall be entitled to the full rights of a party and shall be served with the Commission's Orders and with filed testimony, exhibits, pleadings, correspondence, and all other documents submitted by parties after the date of this Order.
- 5. Should MCI file documents of any kind with the Commission in the course of these proceedings, it shall also serve a copy of said documents on all other parties of record.

Done at Frankfort, Kentucky, this 31st day of July, 1992.

PUBLIC SERVICE COMMISSION

Chairman

Vice Chairman

Commissioner

ATTEST:

Executive Director

RECEIVED

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMITS TON 37 PH '92

In the Matter of:

PUBLIC SERVICE SOUTH CENTRAL BELL TELEPHONE COMPANY'S XOUNTY SEED NO. PROPOSED REVISIONS TO ITS KENTUCKY CASE NO. 92-3/5

> MCI TELECOMMUNICATIONS CORPORATION'S MOTION FOR FULL INTERVENTION

INTRASTATE ACCESS TARIFF, P.S.C.

KENTUCKY TARIFF 2E

This motion is respectfully submitted by and on behalf of MCI Telecommunications Corporation ("MCI"), pursuant to 807 KAR 5:001 Section 3(8) and Section 8(3).

MCI hereby moves the Public Service Commission of Kentucky ("Commission") for leave to permit its full intervention in the above-captioned proceeding and for such further relief as is requested herein.

1. The name and the address of the movant is:

MCI Telecommunications Corporation 400 Perimeter Center Terrace, NE Suite 400 Atlanta, Georgia 30346

2. The names and addresses of the legal counsel representing the movant are:

> C. Kent Hatfield William T. Repasky MIDDLETON & REUTLINGER 2500 Brown & Williamson Tower Louisville, Kentucky 40202 (502) 584-1135

Martha P. McMillin Senior Attorney MCI Telecommunications Corporation MCI Center 3 Ravinia Drive Atlanta, Georgia 30346-2102 (404) 668-6324

- 3. On July 2, 1991, South Central Bell Telephone Company (SCB) filed with the Commission, revisions to its Kentucky Intrastate Access Tariff, P.S.C. Kentucky Tariff 2E, which purportedly introduces Open Network Architecture (ONA) Intrastate Access Service and associated charges. SCB supplemented its filing on on July 14, 1992.
- 4. MCI's substantial and specific interest in this preceding is both as a major customer/ratepayer of SCB's local exchange services and as an increasingly significant provider of enhanced services. The ONA tariff filing tendered by SCB will significantly harm MCI and disrupt competition in the interexchange market place. MCI desires to participate to insure that the proposed offering does not and cannot affect the pricing of access charges.
- 5. Additionally, SCB's filed ONA tariff proposes to maintain switched access feature group services alongside the unbundled ONA versions of those feature group services for an eleven month transition period, after which feature groups services will no longer be available. The existing feature group access services have been used by MCI and other IXCs as the vehicle for equal access to the local exchange network. Since divestiture, MCI's order entry processing and billing and audit systems in place for years were designed to be consistent with the feature group access. The dismantling of the feature group services will force MCI to incur enormous

costs to revise its ordering and billing services and, as other IXCs likely will be similarly impacted, will result in a disruption of competition in the interexchange market.

- 6. Finally, the changes which would result from the implementation of SCB's ONA tariff offer no assurance that the ONA versions of feature groups will provide the same services to IXCs and the same rates, or that ONA services will serve as useful, economic substitutions for feature group services. The proposed tariff is not within in the public interest.
- 7. For the foregoing reasons as well as other grounds, MCI additionally requests that the Commission suspend SCB's requested revisions to its Kentucky Intrastate Access Tariff, P.S.C. Kentucky Tariff, 2E. See, KRS 278.260(1).

WHEREFORE, MCI Telecommunications Corporation moves the Commission to issue an order granting MCI full intervention and to suspend the effective date of the proposed tariff revisions until MCI may be heard on this matter.

Respectfully submitted,

MARTHA P. McMILLIN Senior Attorney MCI TELECOMMUNICATIONS CORP. MCI CENTER 3 Ravinia Drive Atlanta, Georgia 30346 (404) 668-6324-2102 C. KENT HATFIELD WILLIAM T. REPASKY MIDDLETON & REUTLINGER 2500 Brown & Williamson Tower Louisville, Kentucky 40202 (502) 584-1135

COUNSEL FOR MCI TELECOMMUNICATIONS CORPORATION

CERTIFICATE OF SERVICE

It is hereby certified that a copy of the foregoing Motion For Full Intervention was served on legal counsel for South Central Bell Telephone Company, 601 West Chestnut Street, Room 407, P.O. Box 32410, Louisville, Kentucky 40232, this 29th day of July, 1992.

Counsel for MCI Telecommunications

Corporation